



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

December 29, 2003

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Southport AWT Facility / MSOP 097-17750-00507

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot 9/16/03



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MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**Southport AWT Facility
3800 West Southport Road
Indianapolis, Indiana 46217**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 097-17750-00507

Issued by: Original signed by Paul Dubenetzky
Paul Dubenetzky, Branch Chief
Office of Air Quality

Issuance Date: December 29, 2003

Expiration Date: December 29, 2008

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary wastewater treatment plant.

Authorized Individual:	Administrator of Water Management Services
Source Address:	3800 West Southport Road, Indianapolis, IN 46217
Mailing Address:	1735 South West Street, Indianapolis, IN 46225
General Source Phone:	(317)327-4083
SIC Code:	4952
County Location:	Marion
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

- (a) Seven (7) emergency diesel engines and pumps, identified as DD-1 through DD-7, constructed in 1982, rated at 363 horsepower, each.
- (b) Five (5) emergency diesel engines and pumps, identified as JD-1 through JD-5, constructed in April 2003, rated at 170 horsepower, each.

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

This permit to operate does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

B.7 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each emissions unit:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMP's shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality

100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC 13-20-3-1] [IC 13-17-3-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, and U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)]:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

B.11 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

C.1 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.4 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements

C.5 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any

applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.6 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

Compliance Monitoring Requirements

C.7 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.8 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected emissions unit while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do not require the certification

by an "authorized individual" as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.9 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.10 Emission Statement [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of regulated pollutants (as defined by 326 IAC 2-7-1(32) "Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other

means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.11 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all recordkeeping requirements not already legally required shall be implemented when operation begins.

C.12 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) Unless otherwise specified in this permit, any semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description:

- (a) Seven (7) emergency diesel engines and pumps, identified as DD-1 through DD-7, constructed in 1982, rated at 363 horsepower, each.
- (b) Five (5) emergency diesel engines and pumps, identified as JD-1 through JD-5, constructed in April 2003, rated at 170 horsepower, each.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.1.1 Emergency Engines [326 IAC 2]

Any change in operation that causes any of the diesel engines to operate more than five hundred (500) hours per twelve (12) consecutive month period shall increase the potential to emit of this source. Thus, the source may become subject to 326 IAC 2-7, Part 70, and 326 IAC 2-2, PSD, and the change shall require prior IDEM, OAQ, approval.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.2 Record Keeping Requirements

To document compliance with Condition D.1.1, the Permittee shall maintain monthly records of the hours of operation of each engine.

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?____, 25 TONS/YEAR SULFUR DIOXIDE ?____, 25 TONS/YEAR NITROGEN OXIDES ?____, 25 TONS/YEAR VOC ?____, 25 TONS/YEAR HYDROGEN SULFIDE ?____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?____, 25 TONS/YEAR FLUORIDES ?____, 100 TONS/YEAR CARBON MONOXIDE ?____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. : _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM / PM

TYPE OF POLLUTANTS EMITTED: TSP, PM₁₀, SO₂, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

PAGE 1 OF 2

**Please note - This form should only be used to report malfunctions
applicable to Rule 326 IAC 1-6 and to qualify for
the exemption under 326 IAC 1-6-4.**

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

* **Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Southport AWT Facility
Address:	3800 West Southport Road
City:	Indianapolis
Phone #:	(317)327-4083
MSOP #:	097-17750-00507

I hereby certify that Southport AWT Facility is ☒ still in operation.
☐ no longer in operation.

I hereby certify that Southport AWT Facility is ☒ in compliance with the requirements of MSOP 097-17750-00507.
☐ not in compliance with the requirements of MSOP 097-17750-00507.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Minor Source Operating Permit

Source Name:	Southport AWT Facility
Source Location:	3800 West Southport Road, Indianapolis, IN 46217
County:	Marion
SIC Code:	4952
Operation Permit No.:	MSOP 097-17750-00507
Permit Reviewer:	CarrieAnn Paukowits / MES

On September 17, 2003, the Office of Air Quality (OAQ) had a notice published in the Indianapolis Star and News, Indianapolis, Indiana, stating that Southport AWT Facility had applied for an operating permit to operate a wastewater treatment plant. The notice also stated that OAQ proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On October 16, 2003, Mario Mazza, Department of Public Works Administrator, submitted comments on the proposed operating permit. The summary of the comments and corresponding responses are as follows (The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded.**):

Comment 1:

Draft Minor Source Operating Permit

Page 1 - Remove all references to the Indianapolis Environmental Resources Management Division (ERMD) in the draft permit because the local group within the Department of Public Works was renamed the Indianapolis Office of Environmental Services (OES) in 2001. Neither ERMD nor OES has regulatory authority over the City of Indianapolis for air quality permits because of a conflict of interest.

Response 1:

All references to the Indianapolis Environmental Resources Management Division have been removed from the permit.

Comment 2:

Draft Source Summary

Page 2 - Remove reference to Indianapolis ERMD in the second sentence.

Response 2:

All references to the Indianapolis Environmental Resources Management Division have been removed from the permit. The first paragraph of Section A is revised as follows:

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) ~~and Indianapolis Environmental Resources Management Division~~. The information describing the source contained in Conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this

descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

Comment 3:

Draft General Conditions, Section B.6(c)

Page 4 - Remove reference to Indianapolis ERMD and address at the top of page 5 of 17.

Response 3:

All references to the Indianapolis Environmental Resources Management Division have been removed from the permit. The address of the local agency, which does not have jurisdiction over this source, has been removed from Condition B.6(c), as follows:

~~Indianapolis Environmental Resources Management Division
Administrative Building
2700 South Belmont Avenue
Indianapolis, IN 46224~~

Comment 4:

Draft General Conditions, Section B.6(d)

Page 5 - Remove reference to Indianapolis ERMD in the last sentence.

Response 4:

All references to the Indianapolis Environmental Resources Management Division have been removed from the permit. Condition B.6(d) is revised as follows:

- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, ~~and Indianapolis Environmental Resources Management Division~~ on or before the date it is due.

Comment 5:

Draft General Conditions, Section B.7(a)

Page 5 - Remove reference to Indianapolis ERMD in the second sentence.

Response 5:

All references to the Indianapolis Environmental Resources Management Division have been removed from the permit. The address of the local agency, which does not have jurisdiction over this source, has been removed from Condition B.7(a), as follows:

~~Indianapolis Environmental Resources Management Division
Administrative Building
2700 South Belmont Avenue
Indianapolis, IN 46224~~

Comment 6:

Draft General Conditions, Section B.7(c)

Page 5 - Remove reference to Indianapolis ERMD three times in paragraph.

Response 6:

All references to the Indianapolis Environmental Resources Management Division have been removed from the permit. Condition B.7(c) is revised as follows:

- (c) A copy of the PMP's shall be submitted to IDEM, OAQ, ~~and Indianapolis Environmental Resources Management Division~~ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, ~~and Indianapolis Environmental Resources Management Division~~. IDEM, OAQ, ~~and Indianapolis Environmental Resources Management Division~~ may require the Permittee to revise its PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Comment 7:

Draft General Conditions, Section B.7(d)

Page 6 - Remove or clarify reference to 40 CFR Part 63 as hazardous air pollution regulations do not currently apply to diesel engines.

Response 7:

Condition B.7(d) states, "To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit." The condition does not require an OMM Plan. The source is not subject to any requirements under 40 CFR 60 or 63, nor is it required to have an OMM Plan.

Comment 8:

Draft General Conditions, Section B.8(b)

Page 6 - Remove reference to Indianapolis ERMD and address.

Response 8:

All references to the Indianapolis Environmental Resources Management Division have been removed from the permit. The address of the local agency, which does not have jurisdiction over this source, has been removed from Condition B.8(b), as follows:

~~Indianapolis Environmental Resources Management Division
Administrative Building
2700 South Belmont Avenue
Indianapolis, IN 46224~~

Comment 9:

Draft General Conditions, Section B.9

Page 6 - Remove reference to Indianapolis ERMD in first paragraph.

Response 9:

All references to the Indianapolis Environmental Resources Management Division have been removed from the permit. Condition B.9 is revised as follows:

B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC 13-20-3-1] [IC 13-17-3-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, ~~Indianapolis Environmental Resources Management Division~~, and U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

Comment 10:

Draft General Conditions, Section B.10(a)(c)

Page 7 - Remove reference to Indianapolis ERMD in Section (a), (c).

Response 10:

All references to the Indianapolis Environmental Resources Management Division have been removed from the permit. Condition B.10 is revised as follows:

B.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)]:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch and ~~Indianapolis Environmental Resources Management Division~~, within thirty (30) days of the change.

- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, ~~and Indianapolis Environmental Resources Management Division~~ shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Comment 11:

Draft General Conditions, Section B.11(a)

Page 7 - Recommend changing time allowed to pay annual fee to IDEM from thirty (30) calendar days to sixty (60) calendar days to allow local governmental unit sufficient time to process invoice through system before incurring a late penalty.

Response 11:

Condition B.11(a) of this permit is required pursuant to 326 IAC 2-1.1-7, Fees, paragraph (7), "Fees shall be paid by mail or in person and shall be paid upon billing by check or money order, payable to "Cashier, Indiana Department of Environmental Management" no later than thirty (30) days after receipt of billing. Nonpayment may result in denial of a permit application or revocation of the permit." Therefore, the condition will not be revised in the permit; however, it is not unusual for IDEM to receive the annual fees beyond this thirty day period. IDEM does not impose late fees beyond this due date, nor in the past has IDEM denied or revoked a permit based solely on this condition.

Comment 12:

Source Operating Conditions, Section C.1(e)

Page 8 - Remove reference to Indianapolis ERMD in sentence.

Response 12:

All references to the Indianapolis Environmental Resources Management Division have been removed from the permit. Condition C.1(e) is revised as follows:

- (e) For any cause which establishes in the judgment of IDEM ~~and Indianapolis Environmental Resources Management Division~~, the fact that continuance of this permit is not consistent with purposes of this article.

Comment 13:

Source Operating Conditions, Section C.4(d)

Page 2 - Remove reference to Indianapolis ERMD and address.

Response 13:

All references to the Indianapolis Environmental Resources Management Division have been removed from the permit. The address of the local agency, which does not have jurisdiction over this source, has been removed from Condition C.4, as follows:

~~Indianapolis Environmental Resources Management Division~~

Southport AWT Facility
Indianapolis, Indiana
Permit Reviewer: CAP/MES

Page 7 of 14
MSOP 097-17750-00507

~~Administrative Building
2700 South Belmont Avenue
Indianapolis, IN 46221~~

Comment 14:

Source Operating Conditions, Testing Requirements, Section C.5(a)(b)(c)

Page 10 - Remove reference to Indianapolis ERMD and address in Section (a)(c). Since there are no testing requirements with this permit, remove or clarify language.

Response 14:

The first sentence of Condition C.5 is the following:

Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval.

Since this permit does not have any testing requirements in Section D, this condition is not applicable to the source at this time. However, the condition is required to stay in the permit because a new facility could be added to the source at some later date. If the new facility has monitoring or testing requirements, the Permittee will be aware of their responsibilities under the testing requirements. Also, this decreases the number of changes to the permit upon modification and lessens the likelihood of confusion.

All references to the Indianapolis Environmental Resources Management Division have been removed from the permit. The address of the local agency, which does not have jurisdiction over this source, has also been removed. Therefore, Condition C.5 is revised as follows:

C.5 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

~~Indianapolis Environmental Resources Management Division
Administrative Building
2700 South Belmont Avenue
Indianapolis, IN 46224~~

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.

- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and Indianapolis Environmental Resources Management Division not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, and Indianapolis Environmental Resources Management Division, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Comment 15:

Compliance Requirements, Section C.6, 7, 8

The diesel engines do not have smoke stacks. Please clarify requirements in this permit.

Response 15:

Conditions C.6, C.7 and C.8 are general conditions included in most operating permits. These conditions will not be removed from the permit for the following reasons:

- (a) Condition C.6 specifies that the commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. This is true regardless of whether any stacks are present. It also clarifies that monitoring or testing must be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.
- (b) Condition C.7 specifies that any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit. Since this permit does not have any testing or monitoring requirements in Section D, this condition is not applicable to the source at this time. However, the condition is required to stay in the permit because a new facility could be added to the source at some later date. If the new facility has monitoring or testing requirements, the Permittee will be aware of their responsibilities under the testing requirements. Also, this decreases the number of changes to the permit upon modification and lessens the likelihood of confusion.
- (c) Condition C.8 describes the required course of action when a stack test shows noncompliance. Since this permit does not have any testing requirements, this condition would not be applicable to the source at this time. However, the condition is required to stay in the permit because a new facility could be added to the source at some later date. If the new facility has testing requirements, the Permittee will be aware of their responsibilities under the testing requirements. Also, this decreases the number of changes to the permit upon modification and lessens the likelihood of confusion.

Comment 16:

Record Keeping and Reporting Requirements, Section C.10(b)(c)

Page 12 - Remove reference to Indianapolis ERMD and address.

Response 16:

All references to the Indianapolis Environmental Resources Management Division have been removed from the permit. The address of the local agency, which does not have jurisdiction over this source, has been removed from Condition C.10 as follows:

~~Indianapolis Environmental Resources Management Division
Administrative Building
2700 South Belmont Avenue
Indianapolis, IN 46224~~

Condition C.10(c) is revised as follows:

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, ~~and Indianapolis Environmental Resources Management Division~~ on or before the date it is due.

Comment 17:

Record Keeping and Reporting Requirements, Section C.11(a)
Page 12 - Remove reference to Indianapolis ERMD twice.

Response 17:

All references to the Indianapolis Environmental Resources Management Division have been removed from the permit. Condition C.11 is revised as follows:

C.11 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner ~~or Indianapolis Environmental Resources Management Division~~ makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner ~~or Indianapolis Environmental Resources Management Division~~ within a reasonable time.
- (b) Unless otherwise specified in this permit, all recordkeeping requirements not already legally required shall be implemented when operation begins.

Comment 18:

Record Keeping and Reporting Requirements, Section C.12(a)
Page 12 - Remove reference to Indianapolis ERMD and address.

Record Keeping and Reporting Requirements, Section C.12(b)
Page 13 - Remove reference to Indianapolis ERMD in sentence.

Response 18:

All references to the Indianapolis Environmental Resources Management Division have been removed from the permit. Condition C.12 is revised as follows:

C.12 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

~~Indianapolis Environmental Resources Management Division
Administrative Building
2700 South Belmont Avenue
Indianapolis, IN 46224~~

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, ~~and Indianapolis Environmental Resources Management Division~~ on or before the date it is due.
- (c) Unless otherwise specified in this permit, any semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Comment 19:

Facility Operation Conditions, Section D.1.1

Page 14 - Recommend changing first sentence to read: Any change in operation that causes each of the diesel engines to operate more than five hundred (500) hours per twelve (12) consecutive month period shall increase the potential to emit of this source.

Reason: The emission data on page 3 of 5 of the TSD Limited Potential to emit was calculated in the application and confirmed by OAQ based on 500 hours per engine per year.

Response 19:

In order to be considered emergency engines and pumps, each engine must not operate more than five hundred (500) hours per year. The hours of operation may exceed 500 hours per year for the total of all engines. In order to clarify the intent of Condition D.1.1, it is revised as follows:

D.1.1 Emergency Engines [326 IAC 2]

Any change in operation that causes **any of** the diesel engines to operate more than five hundred (500) hours per twelve (12) consecutive month period shall increase the potential to emit of this source. Thus, the source may become subject to 326 IAC 2-7, Part 70, and 326 IAC 2-2, PSD, and the change shall require prior IDEM, OAQ, approval.

Comment 20:

Technical Support Document - Potential to Emit, Section (c)

Page 3 - Recommend changing sentence to read: Since the twelve (12) pumps are only used in

emergency situations caused by extreme precipitation events, the potential emissions are based on 500 hours per engine of operation per year.

Response 20:

The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. The statement above is true. The potential emissions are based on 500 hours of operation per engine per year.

Comment 21:

Technical Support Document - Limited Potential to Emit

Page 3 - Recommend changing last sentence in text to read: Therefore, the potential to emit is based on 500 hours of operating time per engine per year.

Response 21:

The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. The potential to emit is based on 500 hours of operating time per engine per year.

Comment 22:

Technical Support Document - State Rule Applicability - Entire Source, 326 IAC 2-6 (Emission Reporting)

Since there are no emission control devices on the diesel pumps, please clarify the minimum requirements that must be submitted annually in the emission statement to comply with 326 IAC 2-6-4.

Response 22:

Although there are no emission control devices, an annual emission statement is required as summarized in 326 IAC 2-6-4. A copy of this rule is attached. The only portion of 326 IAC 2-6-4 that pertains only to control equipment is 326 IAC 2-6-4(5).

Comment 23:

Technical Support Document - Last page containing chart/calculations for twelve (12) Emergency Diesel engines and Pumps. Recommend changing the following statements under Emergency Equipment for seven (7) rated at 363 hp and five (5) rated at 170 hp as follows: (Less than 500 hours/engine/year).

Response 23:

The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit

decision. The potential to emit is based on 500 hours of operating time per engine per year.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for New Source Construction and a Minor Source Operating Permit

Source Background and Description

Source Name:	Southport AWT Facility
Source Location:	3800 West Southport Road, Indianapolis, IN 46217
County:	Marion
SIC Code:	4952
Operation Permit No.:	MSOP 097-17750-00507
Permit Reviewer:	CarrieAnn Paukowits / MES

The Office of Air Quality (OAQ) has reviewed an application from Southport AWT Facility relating to the operation of a wastewater treatment plant.

Permitted Emission Units and Pollution Control Equipment

There are no permitted facilities operating at this source during this review process.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units:

- (a) Seven (7) emergency diesel engines and pumps, identified as DD-1 through DD-7, constructed in 1982, rated at 363 horsepower, each.
- (b) Five (5) emergency diesel engines and pumps, identified as JD-1 through JD-5, constructed in April 2003, rated at 170 horsepower, each.

New Emission Units and Pollution Control Equipment

There are no new facilities proposed at this source during this review process.

Existing Approvals

The source has no previous air approvals.

Stack Summary

There are no stacks associated with the emission units that comprise this source.

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and/or operated prior to receipt of the

proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*.

- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on July 29, 2003.

Emission Calculations

See page 1 of 1 of Appendix A of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential To Emit (tons/year)
PM	1.87
PM ₁₀	1.87
SO ₂	1.74
VOC	2.13
CO	5.66
NO _x	26.3

HAPs	Potential To Emit (tons/year)
Individual HAPs	negligible
TOTAL	negligible

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of NO_x is equal to or greater than twenty-five (25) tons per year, and less than one hundred (100) tons per year. Therefore, the

source is subject to the provisions of 326 IAC 2-6.1.

- (b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.
- (c) Since these pumps are only used in emergency situations caused by extreme precipitation events, the potential emissions are based on 500 hours of operation per year.

Actual Emissions

No previous emission data has been received from the source.

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Twelve (12) diesel powered pumps	1.87	1.87	1.74	2.13	5.66	26.3	negligible
Total Emissions	1.87	1.87	1.74	2.13	5.66	26.3	negligible

The limited potential to emit is equivalent to the unrestricted potential emissions from the source, since there are no limitations on the potential to emit in the permit. The pumps are only used in emergency situations caused by extreme precipitation events. Therefore, the potential to emit is based on 500 hours of operation per year.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM ₁₀	attainment
SO ₂	maintenance
NO ₂	attainment
Ozone	maintenance
CO	maintenance
Lead	maintenance

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Marion County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source based on the emissions summarized in this permit, MSOP 097-17750-00507, is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than one hundred (100) tons per year,
- (b) a single hazardous air pollutant (HAP) is less than ten (10) tons per year, and
- (c) any combination of HAPs is less than twenty-five (25) tons per year.

This is the first air approval issued to this source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14, 326 IAC 20, 40 CFR 61 and 40 CFR Part 63) applicable to this source.
- (c) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source because the source is not a major source of hazardous air pollutant (HAP) emissions (i.e., the source does not have the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs), and the source does not include one or more units that belong to one or more source categories affected by the Section 112(j) MACT Hammer date of May 15, 2002.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

The unrestricted potential to emit PM, PM₁₀, SO₂, NO_x, VOC and CO are less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2, PSD, are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of NO_x in Marion County. Pursuant to this rule, the owner/operator of the

source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

State Rule Applicability - Individual Facilities

326 IAC 6-1 (County Specific Particulate Matter Limitations)

This source, not specifically listed in 326 IAC 6-1-8.1 through 326 IAC 6-1-18, has a potential to emit of particulate less than 100 tons per year, and has actual particulate emissions less than 10 tons per year. Therefore, the requirements of 326 IAC 6-1 are not applicable.

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

Since these engines and pumps are not part of a manufacturing process, the requirements of 326 IAC 6-3 are not applicable.

326 IAC 9-1 (Carbon Monoxide Emission Limits)

Since this source does not consist of petroleum refining, ferrous metal smelting or refuse incineration, the requirements of 326 IAC 9-1-2 are not applicable.

326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories)

This source is not in a source category listed in 326 IAC 10-3-1. Therefore, the requirements of 326 IAC 10-3 are not applicable.

326 IAC 10-4 (Nitrogen Oxides Budget Trading Program)

This source does not consist of electric generating units or large affected units as defined by 326 IAC 10-4-2(16) and (27). Therefore, the requirements of 326 IAC 10-4 are not applicable.

Conclusion

The operation of a wastewater treatment plant shall be subject to the conditions of the attached proposed Minor Source Operating Permit 097-17750-00507.

Appendix A: Emission Calculations
Internal Combustion Engines - Diesel Fuel
(<600 HP)
Twelve (12) Emergency Diesel Engines and Pumps

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Company Name: Southport AWT Facility
Address City IN Zip: 3800 West Southport Road, Indianapolis, IN 46217
MSOP: 097-17750
Plt ID: 097-00507
Reviewer: CarrieAnn Paukowits
Date: July 29, 2003

Seven (7) rated at 363 hp

Mechanical Output
Horsepower (hp)

Potential Throughput
hp-hr/yr

Emergency Equipment
(LESS THAN 500 HOURS/YEAR)

2541

1270500

Emission Factor in lb/hp-hr	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	2.20E-03	2.20E-03	2.05E-03	0.031	2.51E-03	6.68E-03
Potential Emission in tons/yr	1.40	1.40	1.30	19.7	1.60	4.24

Five (5) rated at 170 hp

Mechanical Output
Horsepower (hp)

Potential Throughput
hp-hr/yr

Emergency Equipment
(LESS THAN 500 HOURS/YEAR)

850

425000

Emission Factor in lb/hp-hr	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	2.20E-03	2.20E-03	2.05E-03	0.031	2.51E-03	6.68E-03
Potential Emission in tons/yr	0.468	0.468	0.436	6.59	0.534	1.42

Totals in tons/yr	PM	PM10	SO2	NOx	VOC	CO
	1.87	1.87	1.74	26.3	2.13	5.66

Methodology

Potential Throughput (hp-hr/yr) = hp * 500 hrs/yr

Use a conversion factor of 7,000 Btu per hp-hr to convert from horsepower to Btu/hr, unless the source supplies a source-specific brake-specific fuel consumption (AP-42, Footnote a, Table 3.3-1)

Emission Factors are from AP42 (Supplement B 10/96), Table 3.3-1.

Emission (tons/yr) = [Potential Throughput (hp-hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton)

*PM emission factors are assumed to be equivalent to PM10 emission factors. No information was given regarding which method was used to determine the factor or the fraction of PM10 which is condensable.

Since each engine has a rating less than 600 hp, the emission factors for each are the same and only one calculation is required.